

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

RONALD HOLLON,)	
)	
Plaintiff,)	
)	
v.)	
)	CIVIL ACTION FILE NO.:
CSX TRANSPORTATION, INC.)	2:06-CV-1099-WKW
)	
Defendant.)	
_____)	

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Ronald Hollon and Defendant CSX Transportation ("CSXT") hereby move for an extension of time in this case:

1. Pursuant to the February 8, 2007 Uniform Scheduling Order issued by the Court, the deadline for the parties to file dispositive motions is September 1, 1007. The Order sets a discovery deadline of February 6, 2008. The matter is currently set for trial beginning on March 24, 2008.

2. The parties are currently in the midst of discovery. The parties have sought to complete discovery prior to the existing dispositive motion deadline, but have been unable to do so because of difficulties in coordinating the schedules of the witnesses, who live in Alabama, Georgia, and Florida. The parties are working to schedule these depositions in August and September, including the depositions of several senior members of Defendant's management. Completion of discovery is further complicated because Plaintiff's counsel will be preparing for and in trial in October 2007.

3. The parties respectfully request that the dispositive motion deadline be extended to December 1, 2007 so that these depositions can be considered as part of the parties' dispositive motion submissions.

4. This Motion is not being filed in an attempt to unnecessarily delay these proceedings, nor will it effect the discovery deadline or trial setting.

WHEREFORE, the parties respectfully request that the Court grant the requested extensions of time. A proposed Order is attached hereto for the Court's convenience.

This 22nd day of August, 2007.

Respectfully submitted,

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